



# California Regional Water Quality Control Board

## Los Angeles Region



Linda S. Adams  
Cal/EPA Secretary

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Arnold Schwarzenegger  
Governor

July 9, 2010

Mr. Jon Armstrong  
ARCO/BP West Coast Products LLC  
501 Westlake Park Blvd., WL1-28.160D  
Houston, TX 77079

**UNDERGROUND STORAGE TANK PROGRAM – DIRECTIVE TO TAKE CORRECTIVE ACTION IN RESPONSE TO UNAUTHORIZED UNDERGROUND STORAGE TANK RELEASE – HEALTH AND SAFETY CODE SECTION 25296.10 AND TITLE 23, CHAPTER 16, CALIFORNIA CODE OF REGULATIONS, SECTIONS 2720-2727**

**ARCO #1289**

**4861 EAST FIRESTONE BOULEVARD, SOUTH GATE (CASE NO. I-12054) (Priority A1)**

Dear Mr. Armstrong:

Pursuant to Health and Safety Code section 25296.10, you are required to take corrective action (i.e., Preliminary Site Assessment, Soil and Water Investigation, Corrective Action Plan Implementation, and Verification Monitoring) to ensure protection of human health, safety and the environment. Corrective action requirements are set forth in California Code of Regulations (CCR), title 23, sections 2720 through 2727.

**Confirmation Soil Boring Investigation and Soil Vapor Survey (Per CCR Title 23, §2727)**

We have reviewed your "Air Sparge/Soil Vapor Extraction System Shutdown Request" dated May 20, 2010, prepared by your consultant ARCADIS US, Inc., "Third Quarter Site Conceptual Model Update" dated October 15, 2009, prepared by your consultant Stantec, and other previously submitted reports. Currently the site is a used car sales lot and is scheduled to be demolished by the City of South Gate for construction of the City Hall annex. An Air Sparging/Soil Vapor Extraction (AS/SVE) system has been operated onsite from April 2004 to December 2009. The mass removal rate of the AS/SVE system has declined from 272 pounds per day (lbs/day) in April 2004 to 16 lbs/day in November 2009. ARCADIS is proposing to permanently shut down the AS/SVE system, decommission the remedial system equipment, and abandon all on-site and two offsite (MW-15 and MW-16) remedial and monitoring wells. Based on our review, we have the followings comments:

1. MTBE concentrations in the offsite down gradient wells MW-24 and MW-25 showed an increasing trend. This indicates that the contamination is migrating further offsite. If the contamination concentrations continue to increase, you are required to submit workplan to further define the offsite groundwater contamination plume.
2. Our calculation showed the mass removed daily by the SVE system in November 2009 to be over a hundred pounds per day. Your report only showed the mass removal rate at 16 pounds per day. You are required to submit a description and calculations used to determine the daily mass removal to our office by **August 15, 2010**.

*California Environmental Protection Agency*



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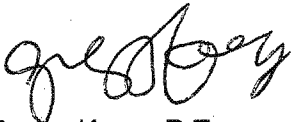
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3. You are required to submit a confirmation soil sampling and soil gas investigation workplan to determine the current subsurface condition beneath the site to our office by **August 15, 2010**. Based on the data from this investigation, a decision shall be made if additional soil remediation would be required, utilizing existing AS/SVE system or other alternative approaches.

For now, you are required to reactivate the AS/SVE system to further reduce the mass of the contamination. The treatment system is to be operational until we complete our evaluation of your system shutdown request or the mass removal reaches asymptotic condition. The remediation progress report is due to our office semi-annually along with the semi-annual groundwater monitoring report, with the next one due by **January 15, 2011**.

If you have any questions regarding this matter, please contact Mr. Nhan Bao at (213) 576-6703 or nbao@waterboards.ca.gov.

Sincerely,



Gregg Kwey, P.E.  
Senior Water Resource Control Engineer

cc: Ms. Kathy Jundt, State Water Resources Control Board, UST Cleanup Fund  
Mr. Tim Smith, Los Angeles County Department of Public Works  
Ms. Gladis Deras, City of South Gate, 8650 California Ave., South Gate, CA 90280  
Ms. Norma Jauregui, 14830 Orange Grove Ave., Hacienda Heights, CA 91745  
Mr. Jeremie Maehr, ARCADIS

